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Probationary Certification Category Explained

In a 2017 blog post, [John Horton](https://www.linkedin.com/in/johnhorton-ceo/), CEO, and President of LegitScript, explained the introduction of the Probationary Status category in LegitScript's pharmacy merchant certification.

NOTE: Probationary certification has been an active offering since 2017.

Why a Probationary Category Is Necessary

LegitScript pharmacy certification is intended to distinguish between pharmacy or telemedicine merchants that are operating lawfully and those that are not. Sometimes, however, an applicant has had some fairly serious problems in the past, but indicates they have fixed the issues and intend to operate in compliance going forward.

In these cases, I'm often hesitant to put LegitScript's name and brand behind the applicant as being "LegitScript-approved." But I'm also hesitant not to approve them, as long as they remain licensed and are now fully legally compliant. After all, we want to incentivize and reward discontinuation of problematic activity.



So the challenges have been: how can we offer certification to these sorts of applicants, while recognizing that enhanced scrutiny is needed; and how can we convey to the public that even though we are certifying the applicant, we're cognizant of prior problems and watching closely for them?

About Probationary Status

In response, we're creating the Probationary Status category for healthcare merchants that we've identified as having engaged in past illicit activity. Here are some of the parameters for eligibility:

- There is compelling evidence of problematic activity that is both serious and fairly recent (e.g., within the last five years). Note that prior discipline alone doesn't mean that a pharmacy's only option is probationary — rather, it has to be pretty serious stuff, such as importing unapproved drugs or selling prescription drugs without a prescription.
- We have to be convinced that the behavior has stopped, and that it won't re-occur.
- As part of this, we'll require full disclosure regarding the circumstances of the violation. We expect the applicant to take responsibility for it (not simply offer excuses!) and to present a remediation plan.

Applicants certified with probationary status will be subject to a higher level of scrutiny and monitoring going forward. As part of the certification process, we'll likely be asking for additional documentation and information. Our website will identify the applicant as certified and thus legitimate, but we will also note that the merchant is on probationary status and explain why.

It's important to emphasize that Probationary Status is not for pharmacies that are operating legally in one jurisdiction but illegally elsewhere.

Probationary status isn't a "wink-wink" at illegal behavior. It's full certification, and as such requires full compliance with our standards.

A few other points. In general, our goal is for probationary status to last no longer than three years. (It is a minimum of one year.) It's also a one-shot deal: if an applicant is certified with probationary status, and we find out that the problematic behavior has resumed, was never truly discontinued, or that the application did not disclose material facts about the activity, the applicant will receive a lifetime bar from LegitScript approval, and will be classified as rogue or unapproved going forward. As to pricing, it will be on a case-by-case basis, but will typically cost more than standard certification, simply because our monitoring is going to be more intensive.

All of that said, I think this is the right approach to take: if a pharmacy or telemedicine merchant has fixed past problems that were serious, and is now in compliance everywhere it is operating, and its licensing authority (e.g., board of pharmacy) has seen fit to allow it to maintain its professional license as a pharmacy or other healthcare provider, we want to recognize that. But it's also incumbent upon us to convey to our partners, and to internet users, that we are aware of prior problems and are watching carefully to ensure that they do not re-occur.

For any further questions, [contact us](https://www.legitscript.com/contact/) (<https://www.legitscript.com/contact/>).

Thea Le Fevre (<https://www.legitscript.com/author/thea-le-fevre/>)

Smelting words into a specialty since 2020, Thea Le Fevre specializes in B2B SaaS Content Marketing. Take a deep dive into her work for up-to-date industry news surrounding issues in payments risk & compliance, trust & safety, regulatory compliance, and more.



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👤 Thea Le Fevre (<https://www.legitscript.com/author/thea-le-fevre/>)
📅 January 13, 2025

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